

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LAKSHMI BALACHANDRA,

Plaintiff,

v.

BABSON COLLEGE,

Defendant.

Civil Action No. 23-cv-10456-JEK

JOINT PROPOSED SCHEDULING ORDER

Pursuant to Rule 16(b) and Local Rule 16.1, plaintiff Lakshmi Balachandra (“Plaintiff”) and Defendant Babson College (“Defendant”) (collectively, the “Parties”) have conferred regarding the schedule for completing expert discovery and dispositive motion practice and hereby jointly submit this Proposed Scheduling Order, attached hereto at Exhibit A.

Dated: July 2, 2024

Respectfully submitted,

<p>LAKSHMI BALACHANDRA</p> <p>By her attorneys,</p> <p><u>/s/ Monica Shah</u></p> <p>Monica R. Shah (BBO # 664745) Thomas M. Miller (BBO # 708133) Zalkind Duncan & Bernstein LLP 65A Atlantic Avenue Boston, MA 02110 (617) 742-6020 (telephone) (617) 742-3269 (fax) mshah@zalkindlaw.com tmiller@zalkindlaw.com</p>	<p>BABSON COLLEGE</p> <p>By its attorneys,</p> <p><u>/s/ Benjamin Davis</u></p> <p>Allison Dearington (pro hac vice) Benjamin R. Davis (BBO # 6783017) JACKSON LEWIS P.C. 75 Park Plaza, 4th Floor Boston, MA 02116 T: 617-367-0025 F: 617-367-2155 Benjamin.davis@jacksonlewis.com</p>
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CERTIFICATE OF SERVICE

This hereby certifies that on this 2nd day of July, 2024, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by electronic mail and first-class mail to non-registered participants.

/s/ Benjamin Davis

EXHIBIT A

**UNITED STATES DISTRICT COURT
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[PROPOSED] SCHEDULING ORDER

July ____, 2024

KOBICK, D.J.

This scheduling order is intended to provide a reasonable timetable for expert discovery and motion practice in order to help ensure a fair and just resolution of this matter without undue expense or delay.

TIMETABLE FOR EXPERT DISCOVERY AND MOTION PRACTICE

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(f), it is hereby ORDERED that:

1. Expert Discovery.

- a. Plaintiff's Expert Disclosures must be served by **August 9, 2024**.
- b. Defendant's Expert Disclosures must be served by **September 13, 2024**.
- c. All expert depositions must be completed by **October 18, 2024**.

2. Dispositive Motions.

- a. Summary Judgment Motions must be filed by **November 15, 2024**.
- b. Oppositions must be filed by **December 20, 2024**.

c. Replies must be filed by **January 15, 2025**.

3. Initial Pretrial Conference. An initial pretrial conference will be held following a ruling on summary judgment motions on a date and time set by the Court. The parties shall prepare and submit a pretrial memorandum in accordance with Local Rule 16.5(d) five business days prior to the date of the conference.

PROCEDURAL PROVISIONS

1. Extension of Deadlines. Motions to extend or modify deadlines will be granted only for good cause shown.

2. Additional Motion to Compel Discovery. Except for good cause shown, Defendant must file a motion to compel discovery in relation to the requests for admission it served on Plaintiff on June 14, 2024, if any all, **no later than July 22, 2024**.

3. Additional Conferences. Upon request of counsel, or at the Court's own initiative, additional case-management or status conferences may be scheduled.

Hon. Julia E. Kobick
United States District Judge